

FILED

JUN 29 2022

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

WESLEY ADAM DAVIS CRIBB,

Defendant.

Criminal No. 3:22-CR- 39
Violation: 18 U.S.C. § 371

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Conspiracy)

From on or about March 4, 2020, to on or about December 31, 2020, in Berkeley County in the Northern District of West Virginia and elsewhere, the defendant **WESLEY ADAM DAVIS CRIBB**, unlawfully, knowingly, and willfully did combine, conspire, confederate, and agree with others to commit an offense against the United States, to wit, to purchase, possess, and transfer firearms to persons prohibited from possessing firearms, in violation of the Gun Control Act, Title 18, United States Code, Sections 922(a), 922(g), and 924(a).

MANNER & MEANS

1. It was a part of the conspiracy that Ronald Louis Browning would purchase firearms from Federal Firearms Licensees (“FFLs”) in Berkeley County, West Virginia.
2. Defendant **WESLEY ADAM DAVIS CRIBB** would direct and provide United States Currency for Ronald Louis Browning to purchase firearms.

3. Ronald Louis Browning would purchase firearms and complete the ATF Form 4473 averring that he was the true purchaser of the firearms.

4. After Ronald Louis Browning purchased and acquired the firearms, he and defendant **WESLEY ADAM DAVIS CRIBB** transferred the firearms to others, including prohibited persons, in exchange for United States currency or controlled substances.

OVERT ACTS

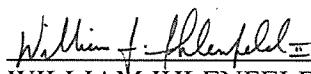
5. In furtherance of the conspiracy and to effect the objects of the conspiracy the following overt acts, among others, were committed in the Northern District of West Virginia and elsewhere:

- a. On or about July 3, 2020, in Berkeley County, in the Northern District of West Virginia, Ronald Louis Browning, aided and abetted by defendant **WESLEY ADAM DAVIS CRIBB**, in connection with the acquisition of a firearm, that is a Canik/Century Arms, 9mm TP9SF pistol, bearing serial number 20AT17890, from a FFL, knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to Ronald Louis Browning under Chapter 44 of Title 18, United States Code, in that Ronald Louis Browning represented that he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm;
- b. On or about July 9, 2020, in Berkeley County, in the Northern District of West Virginia, Ronald Louis Browning, aided and abetted by defendant **WESLEY ADAM DAVIS CRIBB**, in connection with the acquisition of firearm, that is a Taurus 9mm, G2C pistol, bearing serial number ABG674927, from a FFL, knowingly made a false and

fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to Ronald Louis Browning under Chapter 44 of Title 18, United States Code, in that Ronald Louis Browning represented that he was the actual purchaser of the firearm, when in fact, he was not the true purchaser of the firearm; and

c. other overt acts.

All in violation of Title 18, United States Code, Section 371.


WILLIAM IHLENFELD
United States Attorney